UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-31828

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES & TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICAN, LOCAL 31, AFL-CIO,

And

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC

And

Case No. 5-CA-33125 (formerly 2-CA-36129)

NATIONAL ASSOCIATION OF BROADCAST EMPLOYEES & TECHNICIANS, COMMUNICATIONS WORKERS OF AMERICAN, LOCAL 11, AFL-CIO.

CNN AMERICA, INC.'S REQUEST FOR EXTENSION OF TIME TO FILE A BRIEF IN RESPONSE TO THE CROSS-EXCEPTIONS OF THE GENERAL COUNSEL AND FOR AN ENLARGEMENT OF THE PAGE LIMIT

Respondent, CNN America, Inc. ("CNN"), hereby respectfully requests an extension of time and an enlargement of the page limit for its brief in response to the cross-exceptions of the General Counsel. Consistent with sections 102.46 and 102.114 of the Rules and Regulations of the National Labor Relations Board ("Board") and the prior decisions of the Executive Secretary and Assistant Executive Secretary in this case, CNN asks that it be permitted to file a brief in response to the General Counsel's cross-exceptions of no more than 100 letter-sized, double-spaced pages on or before Monday, May 18, 2009. In support of this request, CNN states as follows:

1. On March 3, 2009, the Associate Executive Secretary, Henry S. Breiteneicher, granted in part the General Counsel's request for an extension of time and an enlargement of the page limits for its cross-exceptions and a supporting brief as well as its brief in response to

CNN's exceptions. The General Counsel received a 44-day extension until April 2, 2009 to file cross-exceptions to Judge Amchan's decision, and permission to file a supporting brief of 100 letter-sized, double-spaced pages. *See* NLRB Rules and Regulations §§ 102.46(j) and 102.114(d). In addition, the General Counsel was granted an extension of time to file a 225-page brief on or before April 24, 2009 answering CNN's exceptions.

- 2. The Board's Rules and Regulations provide that a brief in response to another party's cross-exceptions must be filed fourteen days after the filing of the cross-exceptions, and that the briefs are limited to 50 pages each. *Id.* §§ 102.46(d)-(e), (j). The Board's Rules provide the same time period and page limit for briefs in response to cross-exceptions as they do for the filing of cross-exceptions and supporting briefs. *Id.* §§ 102.46(d)-(f)(1), (j).
- 3. CNN proposes that it be allowed the same 44-day extension of time to file a brief in response to the General Counsel's cross-exceptions that the General Counsel was allowed for filing its cross-exceptions. Forty-four days after April 2, 2009 is Saturday, May 16, 2009. CNN requests that it be allowed to file its answering brief the next business day, Monday, May 18, 2009. In addition, CNN asks that its brief in response be limited to no more than 100 letter-sized, double-spaced pages. This would give CNN the same number of pages allotted to the General Counsel, consistent with the Board's Rules and the prior decisions of the Associate Executive Secretary. *Id*.

Respectfully Submitted,

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UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

CNN AMERICA, INC. AND TEAM VIDEO SERVICES, LLC, JOINT EMPLOYERS

and

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AFFIDAVIT OF SERVICE

Eric Engberg, being duly sworn, deposes and says as follows:

- 1. I am over 18 years of age, am not a party to this proceeding, and am employed by the law firm of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, N.W., Washington, D.C. 20005.
- 2. On the 4th day of March, 2009, I filed, by E-file, CNN America, Inc.'s Request For Extension Of Time To File A Brief In Response To The Cross-Exceptions Of The General Counsel And For An Enlargement Of The Page Limit, with Henry S. Breiteneicher, Associate Executive Secretary, National Labor Relations Board, 1099 14th Street, N.W., Washington, D.C. 20570.

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3. On the 4th day of March, 2009, I served one true and correct copy of CNN America, Inc.'s Request For Extension Of Time To File A Brief In Response To The Cross-Exceptions Of The General Counsel And For An Enlargement Of The Page Limit, by e-mail, on the following:

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4. On the 4th day of March, 2009, I served one true and correct copy of CNN America, Inc.'s Request For Extension Of Time To File A Brief In Response To The Cross-Exceptions Of The General Counsel And For An Enlargement Of The Page Limit, by overnight delivery on the following and notified the same by telephone at the numbers below:

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Eric Engberg

Sworn to before me this 4th day of March, 2009

Votary Public Carole L. Stephens

Notary Public, District of Columbia My Commission Expires 2-14-2010

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